

## REMARKS

### INTRODUCTION:

In accordance with the foregoing, claims 1-3, 6, 11-12, and 15 have been canceled. Claims 4, 8, and 14 have been amended. No new matter is being presented, and approval and entry are respectfully requested.

Claims 4, 5, 7, 8, 13, and 14 are pending and under consideration. Reconsideration is respectfully requested.

### REJECTION UNDER 35 U.S.C. §112:

At page 2 of the Office Action, claims 1-8 and 11-15 are rejected under 35 U.S.C. §112, second paragraph, for the reasons set forth therein. Claims 1-3, 6, 11-12, and 15 have been canceled. Claims 4, 8, and 14 have been amended to clarify the invention and are now believed to be in condition for allowance. Claims 5, 7, and 13 depend from claim 4. Accordingly, withdrawal of the 35 U.S.C. §112 rejection is respectfully requested.

### REJECTION UNDER 35 U.S.C. §102

At page 3 of the Office Action, claims 1-5, 7-8, 11, and 15 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 5,987,591 to Jyumonji. Claims 1-3, 11, and 15 have been canceled. Independent claims 4 and 8 have been amended. However, as the cited art may still be relevant, the rejection is traversed and reconsideration is requested.

Regarding claim 4, the Examiner cites Jyumonji for teaching a portable teaching pendant as recited. The Applicants respectfully disagree. Claim 4 is directed to an image processing apparatus for a robot wherein

a portable teaching pendant is connected to said robot controller through a cable; and

said teaching pendant comprises a unit for generating or editing a robot program, a unit for operating the robot, and a display unit, and can display on the display unit the converted image, and comprises a unit used for manipulation for image processing.

Jyumonji does not teach or suggest a teaching pendant comprising a unit for generating or editing a robot program, a unit for operating the robot,... and a unit for manipulation for image

processing. Rather, Jyumonji discusses a teaching control panel connected to a robot controller. The teaching control panel of Jyumonji has button groups used in an ordinary jog-feeding in XYZ directions. The Applicants respectfully submit that these buttons do not suggest a unit used for manipulation for image processing.

Further, the Applicants respectfully submit that it appears that the Examiner has already admitted that Jyumonji does not teach or suggest the teaching pendant as recited. At page 2 of the Office Action, the Examiner states

Applicant's arguments, see Remarks, pages 6-10, filed on 9/17/2004, with respect to the rejection(s) of claim(s) 1, 2, 4, 8, 14 and 15 under 35 U.S.C. §103(a) have been fully considered and are persuasive. Therefore the rejection has been withdrawn.

These arguments were made in response to an earlier rejection of claims 1-14 under 35 U.S.C. §103(a) as being unpatentable over a primary reference in view of Jyumonji. One of the arguments made was that "As admitted by the Examiner, Jyumonji does not teach or suggest manipulating the image data using a teaching pendant." *See also Office Action*, mailed May 19, 2004, pages 2-3.

The Applicants respectfully submit that since Jyumonji fails to teach or suggest all of the features of claim 4, claim 4 is allowable over the prior art. Thus, withdrawal of the §102(e) rejection is respectfully requested.

Regarding claims 5 and 7, these claims depend from independent claim 4, and are therefore believed to be allowable for at least the reasons noted above.

Regarding claim 8, the Examiner cites Jyumonji for teaching the displaying operation as recited in claim 8. The Applicants respectfully disagree. Claim 8 now recites

displaying the converted image data on a teaching pendant used for generating or editing a robot program or used for operating said robot,

wherein said displaying displays the image data and indication for manipulation for image processing simultaneously, or allows a user to enter a switching mode or a superposition mode.

Jyumonji does not teach displaying data on a teaching pendant used for generating or editing a robot program or used for operating said robot. Further, Jyumonji does not suggest a teaching pendant displaying image data and indication for manipulation for image processing simultaneously, or in switching or superposition modes. Rather, Jyumonji mentions a teaching control panel that has a function to designate a jog-movement target position on a display screen. Applicants respectfully submit that "designating a jog-movement target position" does

not suggest the features as claimed.

The Applicants respectfully submit that since Jyumonji fails to teach or suggest all of the features of claim 8, claim 8 is allowable for at least the reasons noted above.

#### REJECTION UNDER 35 U.S.C. §103

At page 6 of the Office Action, claims 6, 12 and 13 are rejected under 35 U.S.C. §103(a) as being unpatentable over Jyumonji. The reasons for the rejection are set forth in the Office Action and therefore not repeated. Claims 6 and 12 have been canceled. Claim 4, from which claim 13 depends, has been amended. However, as the cited art may still be relevant, the rejection is traversed and reconsideration is respectfully requested.

The Applicants respectfully submit that the rejection fails to establish a prima facie case of obviousness. To establish a prima facie case of obviousness, three basic criteria must be met. MPEP 2142. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference. *Id.* Second, there must be a reasonable expectation of success. *Id.* Finally, the prior art reference must teach or suggest all the claim limitations. *Id.*

Claim 13 depends from independent claim 4. The Examiner states that the arguments as to the applicability of Jyumonji are incorporated in this rejection. As discussed above, Jyumonji does not teach or suggest the teaching pendant as recited in claim 4.

The Applicants respectfully submit that at least because Jyumonji fails to teach or suggest all of the features of claim 13, Jyumonji fails to establish a prima facie case of obviousness. Accordingly, claim 13 is deemed to be allowable over the art of record. Therefore, withdrawal of the §103(a) rejection is respectfully requested.

At page 7 of the Office Action, claim 14 is rejected under 35 U.S.C. §103(a) as being unpatentable over Jyumonji in view of U.S. Patent No. 6,362,813 to Wörn et al. The reasons for the rejection are set forth in the Office Action and therefore not repeated. Claim 14 has been canceled.

#### CONCLUSION

In light of the above discussion and in view of the present amendment, this application is believed to be in condition for allowance and an early and favorable action to that effect is

respectfully requested. At a minimum, this amendment should be entered at least for purposes of appeal because it either clarifies and/or narrows the issues for consideration by the board.

If there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

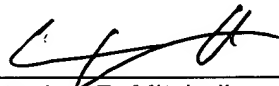
Respectfully submitted,

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6-22-2005

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